

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

MEGHAN COTTON, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MRAE, LLC, MICHELLE EBERT, and  
FRANK COLACURCIO, JR.,

Defendant.

No. 2:22-cv-432

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANT TO RESPOND TO  
COMPLAINT**

Plaintiff Meghan Cotton (“Plaintiff”) and defendant MRAE, LLC (“Defendant”), by and through their undersigned counsel, hereby stipulate to an extension of the time for Defendant to answer or otherwise respond to the Complaint [Dkt. No. 1,] to June 10, 2022.

The Parties hereby submit that good cause exists for extension of the time for Defendant to answer or otherwise respond to the Complaint, as follows.

1. Defendant’s counsel filed a Notice of Appearance on May 10, 2022.
2. Counsel for Plaintiff and Counsel for Defendant have been discussing whether Defendant is a proper named defendant in this matter. The parties have agreed to an extension of the deadline for Defendant to respond to the Complaint to June 10, 2022. The parties agree

STIPULATION AND ORDER TO EXTEND DEADLINE FOR  
DEFENDANT TO RESPOND TO COMPLAINT

– Page 1

**CORR CRONIN LLP**  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154-1051  
Tel (206) 625-8600  
Fax (206) 625-0900

1 that the requested extension would facilitate such discussions, by allowing more time before  
2 Defendant undertakes the expense of preparing a response to the Complaint.  
3

4 DATED this 10<sup>th</sup> day of May, 2022.  
5

6 s/ Todd T. Williams

7 Todd T. Williams, WSBA No. 45032

8 CORR CRONIN LLP

9 1001 Fourth Avenue, Suite 3900

10 Seattle, Washington 98154-1051

11 Telephone: (206) 625-8600

12 Fax: (206) 625-0900

13 E-mail: twilliams@corrchronin.com

14 Attorney for Defendant  
15

16 s/ April Rhéaume

17 April Rhéaume, WSBA No. 57119

18 SANFORD LAW FIRM, PLLC

19 Kirkpatrick Plaza

20 10800 Financial Centre Pkwy, Suite 510

21 Little Rock, Arkansas 72211

22 Telephone: (800) 615-4946

23 Fax: (888) 787-2040

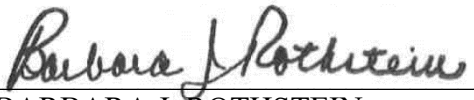
24 Email: april@sanfordlawfirm.com

25 Attorney for Plaintiff

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED.

DATED this 11th day of May, 2022.

  
BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE